

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing an Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208

**ORDER**

**Adopted: December 23, 2011**

**Released: December 23, 2011**

By the Chiefs, Wireline Competition Bureau & Wireless Telecommunications Bureau:

**I. INTRODUCTION**

1. On December 20, 2011, the National Exchange Carriers Association (NECA), the National Telecommunications Cooperative Association (NTCA), the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), and the Western Telecommunications Alliance (WTA), (collectively, the “Rural Representatives”) filed a Joint Motion for waiver of Sections 1.429(d), (f), and (g), of the Commission’s rules, 47 C.F.R. §§ 1.429(d), (f), (g), pertaining to page limitations for petitions for reconsideration, oppositions, and replies to oppositions.<sup>1</sup> For the reasons discussed below, we grant in part the Rural Representatives’ request for a waiver consistent with the page limitations set forth below.

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<sup>1</sup> National Exchange Carrier Association, National Telecommunications Cooperative Association, Organization for the Promotion and Advancement of Small Telecommunications Companies, and the Western Telecommunications Alliance, Joint Motion for Waiver of Page Limit, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Docket Nos. 01-92, 96-45, WT Docket No. 10-208 (filed Dec. 20, 2011) (Joint Motion).

## II. BACKGROUND

2. On November 18, 2011, the Commission released the *USF/ICC Transformation Order*<sup>2</sup> in which the Commission adopted comprehensive reforms to modernize the universal service and intercarrier compensation systems to ensure that robust, affordable voice and broadband service, both fixed and mobile, are available to Americans throughout the nation. The *USF/ICC Transformation Order* was published in the Federal Register on November 29, 2011<sup>3</sup> and petitions for reconsideration are due on December 29, 2011.<sup>4</sup>

## III. DISCUSSION

3. Section 1.429(d) of the Commission's rules prohibits petitions for reconsideration from exceeding 25 double-spaced typewritten pages. Similarly, section 1.429(f) of the Commission's Rules prohibits oppositions to petitions for reconsideration from exceeding 25 double-spaced typewritten pages. Section 1.429(g) of the Commission's rules prohibits replies to an opposition from exceeding 10 double-spaced typewritten pages. The Rural Representatives argue that the *USF/ICC Transformation Order* "addresses a myriad of complex and challenging issues" and spans more than 380 pages, not including ordering clauses or appendices.<sup>5</sup> Accordingly, the Rural Representatives request that the page limits for petitions for reconsideration and oppositions to petitions for reconsideration be extended to 50 pages and the limit for replies to oppositions to petitions for reconsideration be extended to 20 pages.

4. We agree with the Rural Representatives that interested parties should be given sufficient opportunity to provide meaningful comments and necessary information regarding the *USF/ICC Transformation Order*. The length of the *USF/ICC Transformation Order* and complexity of issues presented may require greater discussion than the typical Commission order. Although the Rural Representatives requested a 50 page limit, we believe that a page limit of 40 pages is appropriate for ensuring that petitions for reconsideration and oppositions to concisely state the issues involved in this proceeding.<sup>6</sup> Similarly, we believe that a page limit of 15 pages is appropriate for replies to oppositions.<sup>7</sup> By adopting these extended page limits, we balance the need for parties to address all issues with the Commission's ability to respond adequately to the expected large number of filings.

5. These extensions apply to all parties filing petitions for reconsideration or oppositions to petitions for reconsideration of the *USF/ICC Transformation Order* or who are filing replies to the oppositions.

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<sup>2</sup> See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*).

<sup>3</sup> 76 Fed. Reg. 73830, 73870 (Nov. 29, 2011)

<sup>4</sup> See 47 CFR § 1.429(d).

<sup>5</sup> Joint Motion at 2.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at 3 (proposing 20 page limit for replies to oppositions).

#### IV. ORDERING CLAUSES

6. We partially grant Rural Representatives' motion and extend the page limits applicable to petitions for reconsideration and oppositions to petitions for reconsideration of the Commission's *USF/ICC Transformation Order* to 40 pages and extend the page limit to 15 pages for consolidated replies.

7. Accordingly, IT IS ORDERED, pursuant to Sections 4(i) and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 303(r), and Sections 1.3, 1.429(d), (f) and (g) of the Commission's Rules, 47 CFR §§ 1.3, 1.429(d), (f), and (g), that the Joint Motion filed by the Rural Representatives on December 20, 2011 is PARTIALLY GRANTED and the limit applicable to all parties filing petitions for reconsideration of the Commission's *USF/ICC Transformation Order* IS HEREBY EXTENDED to 40 pages; the limit applicable to all parties filing oppositions to petitions for reconsideration of the Commission's *USF/ICC Transformation Order* IS HEREBY EXTENDED to 40 pages; and the limit applicable to all parties filing replies to oppositions to petitions for reconsideration of the Commission's *USF/ICC Transformation Order* IS HEREBY EXTENDED to 15 pages.

8. These actions are taken under designated authority pursuant to Sections 0.91, 0.131, 0.291, 0.331 of the Commission's Rules, 47 C.F.R. §§ 0.91, 0.131, 0.291, 0.331.

FEDERAL COMMUNICATIONS COMMISSION

Sharon E. Gillett  
Chief  
Wireline Competition Bureau

Rick Kaplan  
Chief  
Wireless Telecommunications Bureau